

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. \_\_

**ORDER SUSTAINING DEBTORS' FIFTY-NINTH  
(SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN OVERSTATED AND/OR  
UNLIQUIDATED PROOFS OF CLAIM (CUSTOMER CLAIMS)**

Upon the fifty-ninth omnibus objection (the “Objection”)<sup>2</sup> of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), for entry of an order (this “Order”) sustaining the Objection and modifying and reducing the Overstated and/or Unliquidated Claims set forth in Schedule 1 attached hereto, and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Objection and the relief requested therein has been provided in accordance with the Bankruptcy

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

<sup>2</sup> Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each Overstated and/or Unliquidated Claim set forth in Schedule 1 attached hereto is modified and reduced. The claims listed in the column titled “Modified Claims” identified in Schedule 1 attached hereto shall remain on the claims register, subject to the Debtors’ further objections on any substantive or non-substantive grounds.
3. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors’ right to object on any other grounds that the Debtors discover is preserved.
4. To the extent a response is filed regarding any Overstated and/or Unliquidated Claim, each such Overstated and/or Unliquidated Claim, and the Objection as it pertains to such Overstated and/or Unliquidated Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Overstated and/or Unliquidated Claim. Any stay of this Order pending

appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

5. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

6. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtors may have to enforce rights of setoff against the claimants.

7. Nothing in the Objection or this Order, nor any actions or payments made by the Debtors pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party-in-interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

8. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

9. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: \_\_\_\_\_  
Wilmington, Delaware

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The Honorable John T. Dorsey  
United States Bankruptcy Judge

**SCHEDULE 1**

**Overstated and/or Unliquidated Claims**

**FTX Trading Ltd. 22-11068 (JTD)**  
**Fifty-Ninth Omnibus Claims Objection**  
**Schedule 1 - Modified Claims**

<b>Asserted Claims</b>					<b>Modified Claim</b>	
<b>Claim Number</b>	<b>Name</b>	<b>Debtor</b>	<b>Tickers</b>	<b>Ticker Quantity</b>	<b>Debtor</b>	<b>Ticker Quantity</b>
23001	Name on file	FTX Trading Ltd.	BUSD		FTX Trading Ltd.	0.1779700900000000
			LUNA2	98,337.0000000000000000		0.0000000000000000
			LUNC	6,423,892,338.0000000000000000		0.0000000000000000

Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat grossly overstate the quantities and holdings in such customer's accounts. The claim should be modified to the claimant's FTX Trading Ltd. customer entitlement. Furthermore, the claimant holds a separate filed claim number 17491 which asserts the FTX EU Ltd. customer entitlement. Accordingly, the Debtors seek to reduce such customer's claim to the modified quantities and amounts.

40936	Name on file	FTX Trading Ltd.	AKRO	9.0000000000000000	FTX Trading Ltd.	0.0000000000000000
			ALGO	1,504.187815995709134		1,504.1878159900000000
			ATOM	30.530058808326302		30.5298351900000000
			AVAX	24.846206586420060		24.8460246000000000
			BAO	49.0000000000000000		0.0000000000000000
			BTC	0.527361038110725		0.5273610300000000
			CHZ	888.499558017558250		888.4930502700000000
			DOT	81.7001748800000000		81.6995764700000000
			ETHW	2.1645138800000000		0.0000000000000000
			EUR	19,107.577228036974840		0.0000000000000000
			FTT	46.2512562700000000		0.0000000000000000
			MATIC	1,268.962052387617092		1,268.9620523800000000
			NEAR	97.569351563710630		97.5686369200000000
			SHIB	5,491,568,474,582,920.0000000000000000		5,491,528.2520325400000000
			SOL	60.355876053645780		60.3558760500000000
			TRX	10.0000000000000000		10.0000000000000000
			USD	25.0000000000000000		0.0000000000000000

Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat grossly overstate the quantities and holdings in such customer's accounts. The claim should be modified to the claimant's FTX Trading Ltd. customer entitlement. Furthermore, the claimant holds a separate filed claim number 40994 which asserts the FTX EU Ltd. customer entitlement. Accordingly, the Debtors seek to reduce such customer's claim to the modified quantities and amounts.

60252	Name on file	FTX Trading Ltd.	ETH	1.5424603800000000	FTX Trading Ltd.	0.7712301900000000
			ETHW	0.0211001000000000		0.0000000000000000
			EUR	137,957.5438776354000000		0.0000000000000000
			FTT	50.0865021800000000		0.0000000000000000
			SOL	0.0029757600000000		0.0000000000000000
			STETH	0.000006606555589		0.0000000000000000
			TRX	20.0000000000000000		0.0000000000000000
			USD	769.707727065020000		0.0000000000000000
			USDC	34,000.0000000000000000		17,000.0000000000000000

Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat grossly overstate the quantities and holdings in such customer's accounts. The claim should be modified to the claimant's FTX Trading Ltd. customer entitlement. Furthermore, the claimant holds a separate filed claim number 60172 which asserts the FTX EU Ltd. customer entitlement. The pending withdrawal amounts shown in the claimant's supporting documentation are included in their FTX EU account balance. Accordingly, the Debtors seek to reduce such customer's claim to the modified quantities and amounts. In addition, based on the Debtors' review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified

55618	Name on file	FTX EU Ltd.	APT	72,495.0000000000000000	FTX Trading Ltd.	724.9533198200000000
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Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat grossly overstate the quantities and holdings in such customer's accounts. The claim should be modified to the claimant's FTX Trading Ltd. customer entitlement. Furthermore, the claimant holds a separate filed claim number 42994 which asserts the FTX EU Ltd. customer entitlement. Accordingly, the Debtors seek to reduce such customer's claim to the modified quantities and amounts. In addition, based on the Debtors' review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim.

94013	Name on file	FTX Trading Ltd.	EUR	140,661.4038796860000000	FTX Trading Ltd.	0.0000000000000000
			USDT	20.0000000000000000		20.0000000000000000

Asserted Claims					Modified Claim	
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Debtor	Ticker Quantity
Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat grossly overstate the quantities and holdings in such customer's accounts. The claim should be modified to the claimant's FTX Trading Ltd. customer entitlement. Furthermore, the claimant holds a separate filed claim number 91086 which asserts the FTX EU Ltd. customer entitlement. Accordingly, the Debtors seek to reduce such customer's claim to the modified quantities and amounts.						
70398	Name on file	FTX Trading Ltd.			FTX Trading Ltd.	
			BTC	9.4340000000000000		4.7170000000000000
			ETH	206.5000000000000000		103.2500000000000000
			LTC	4,240.0000000000000000		2,120.0000000000000000
			USDT	429,842.0000000000000000		214,900.0000000000000000
Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat grossly overstate the quantities and holdings in such customer's accounts. The claim should be modified to the claimant's FTX Trading Ltd. customer entitlement. Furthermore, the claimant holds a separate filed claim number 49146 which asserts the FTX EU Ltd. customer entitlement. Accordingly, the Debtors seek to reduce such customer's claim to the modified quantities and amounts.						
77304	Name on file	FTX Trading Ltd.			FTX Trading Ltd.	
			BTC	1.0000000000000000		0.5000370900000000
			EUR	324,908.1956514720000000		0.0000000000000000
			USDT	189,622.5817122618000000		0.0000000000000000
Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat grossly overstate the quantities and holdings in such customer's accounts. The claim should be modified to the claimant's FTX Trading Ltd. customer entitlement. Furthermore, the claimant holds a separate filed claim number 77446 which asserts the FTX EU Ltd. customer entitlement. Accordingly, the Debtors seek to reduce such customer's claim to the modified quantities and amounts. In addition, based on the Debtors' review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim.						
52226	Name on file	FTX Trading Ltd.	GMX	14,311.0000000000000000	FTX Trading Ltd.	14,311.2615867600000000
			SWEAT	9,552,626.0000000000000000		3,947,356.8149000000000000
			USD	251,610.0000000000000000		0.0000000000000000
			USDC	56,915.0000000000000000		308,524.6646351800000000
Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat overstate the quantities and holdings in such customer's accounts. The claim should be modified to the claimant's FTX Trading Ltd. customer entitlement. Furthermore, the claimant holds a separate filed claim number 52230 which asserts the FTX EU Ltd. customer entitlement. Accordingly, the Debtors seek to reduce such customer's claim to the modified quantities and amounts.						
80328	Name on file	FTX Trading Ltd.	BUSD	77,798.0000000000000000	FTX Trading Ltd.	38,899.0000000000000000
			EUR	95,881.6761316463000000		0.0000000000000000
			MATIC	10,246.0000000000000000		5,123.0000000000000000
			USDC	155,998.0000000000000000		77,999.0000000000000000
Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat grossly overstate the quantities and holdings in such customer's accounts. The claim should be modified to the claimant's FTX Trading Ltd. customer entitlement. Furthermore, the claimant holds a separate filed claim number 70147 which asserts the FTX EU Ltd. customer entitlement. Accordingly, the Debtors seek to reduce such customer's claim to the modified quantities and amounts.						
88580	Name on file	FTX Trading Ltd.	BAND	9.2823391000000000	FTX Trading Ltd.	0.0000000000000000
			BNB	153.0002476200000000		76.5001238100000000
			BTC	1.3992000000000000		0.0000000000000000
			CEL	77,568.8040000000000000		7,568.0000000000000000
			ETH	44,873.6000000000000000		0.6000000000000000
			GALFAN	476,864.0000000000000000		0.0000000000000000
			NEAR	1.6929241000000000		0.0000000000000000
Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat grossly overstate the quantities and holdings in such customer's accounts. The claim should be modified to the claimant's FTX Trading Ltd. customer entitlement. Furthermore, the claimant holds a separate filed claim number 67197 which asserts the FTX EU Ltd. customer entitlement. Accordingly, the Debtors seek to reduce such customer's claim to the modified quantities and amounts.						
64591	Name on file	FTX Trading Ltd.	AAPL	269,416,947.0000000000000000	FTX Trading Ltd.	0.0000000000000000
			AMZN	2.0000000000000000		0.0000000000000000
			BNTX	2.0000000000000000		0.0000000000000000
			BTC	0.4142570400000000		0.2071285200000000



Asserted Claims				Modified Claim	
Claim Number	Name	Debtor	Tickers	Ticker Quantity	
Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat grossly overstate the quantities and holdings in such customer's accounts. The claim should be modified to the claimant's FTX Trading Ltd. customer entitlement. Furthermore, the claimant holds a separate filed claim number 41757 which asserts the FTX EU Ltd. customer entitlement. Accordingly, the Debtors seek to reduce such customer's claim to the modified quantities and amounts.					